

**e-filed 9/28/06

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5 Counsel for Defendant WHITE

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7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,)	No. CR 06-00111-JF
)	
12 Plaintiff,)	
)	
13 v.)	STIPULATION AND [PROPOSED]
)	ORDER TO CONTINUE STATUS DATE
14 JOHN WHITE,)	
)	
15 Defendant.)	
_____)	

16 Assistant United States Attorney Carlos Singh and defendant, John White, through his
17 counsel, Assistant Federal Public Defender Angela M. Hansen, stipulate and agree that the status
18 date in the above-captioned matter, presently scheduled for September 21, 2006, at 9:00 a.m.,
19 should be continued to October 4, 2006 at 9:00 a.m.

20 The offense charged involves conduct that allegedly occurred over 10 years ago. The
21 parties stipulate and agree that the status date should be continued because counsel for Mr. White
22 needs additional time to investigate this case and to collect old records that may be relevant to
23 Mr. White's defense and sentencing exposure. Additionally, the parties are currently conducting
24 plea negotiations. For these reasons, the parties stipulate and agree to continue the status date
25 two weeks, to October 4, 2006, at which time the parties expect to have a disposition.

26 The parties further stipulate and agree that under 18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv),
the ends of justice served by the continuance requested outweigh the best interest of the

1 defendant and public in a speedy trial because the failure to grant such a continuance would
2 unreasonably deny Mr. White the time necessary for effective preparation, taking into account
3 the exercise of due diligence.

4
5 SO STIPULATED.

6
7 Dated: September 19, 2006

/s/

ANGELA M. HANSEN
Assistant Federal Public Defender

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9
10 Dated: September 19, 2006

/s/

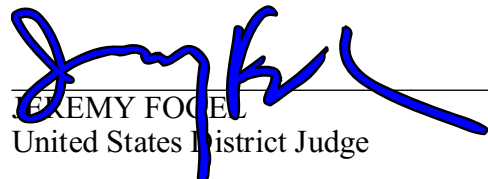
CARLOS SINGH
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 06-00111-JF
)	
Plaintiff,)	[PROPOSED] ORDER CONTINUING
)	STATUS DATE AND EXCLUDING
v.)	TIME
)	
JOHN WHITE,)	
)	
Defendant.)	
_____)	

The parties have jointly requested to continue the status date and good cause appearing, IT IS HEREBY ORDERED that the status date presently set for September 21, 2006 at 9:00 a.m. is continued to October 4, 2006 at 9:00 a.m. Pursuant to the parties' stipulation, IT IS FURTHER ORDERED that the period of time from September 21, 2006 through and including October 4, 2006, shall be excluded from the period of time within which trial must commence under the Speedy Trial Act, 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv).

Dated: September ²¹____, 2006



JEREMY FOGEL
United States District Judge

1 Distribute to:

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